

As Deputy Director of a 911 center in Kitsap County, Washington I welcome the opportunity to comment on the emergency services impact of Voice over IP (VOIP) technology.

Amid the discussions of economic and social impact of VOIP, the interface to E911, the state of the E911 network and all the rest, one important fact must be kept in mind when deciding whether VOIP providers should be considered telecommunications companies. That question is simple:

"What does it do?"

Not how it works, what media it uses for transport, what corporate strategy is used to structure the manufacturing chain. Simply, when a company goes to market with this "thing," what does it do?

If it looks like a duck and quacks like a duck, it's a duck. Maybe I can buy this duck cheaper than that duck, and maybe one duck has differently colored feathers, but I don't care about that. I need a duck so I'm buying a duck.

Do I care that it's an 'Anas americana' or a 'Anas bahamensis'? Nope. I buy a duck for what I can do with it, not for its family tree.

I expect that I can do anything requiring a duck. I can stew it, barbecue it, stuff it, whatever. I don't buy a duck with the agreement that I can't fricassee it. It's a duck. It does duck things. If I find out there's something I cannot do with my duck I am the victim of fraud and deceit.

When it comes to ducks -- and things that look and act like telephones -- it's an all or nothing game. It's either a duck or it isn't. If I can't reach E911 on my phone then it's not a phone. If it's sold to me as a phone but I can't call any number I wish then it's a fancy intercom system and should be sold as such.

The VOIP providers have thus far sold their services and devices as replacements for traditional telephone service. They are inculcating the expectation that it will, in fact, replace telephone service. If it doesn't completely replace that service, then, they are being less than truthful with consumers who expect to call 911 on it. I wonder how well sales would go if every VOIP service and device commercial required a disclosure that the device could not be used to summon help in an emergency? Or how about a message programmed into the device that notified the user when they dialed 911:

"Sorry, the call you placed cannot be completed because this isn't really a telephone. It's an IP-enabled device supplied by an internet services provider. What that means in plain English is that instead of getting that duck we promised you, we sold you a turkey."

Respectfully submitted,
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